Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Application of Ameritech	)	
Michigan Pursuant to Section	)	
271 of the Telecommunications	)	CC Docket No. 97-137
Act of 1996 to Provide In-	)	
Region, InterLATA Services in	)	
Michigan	)	

Exhibit D:
Affidavit of Samuel King
on Behalf of MCI Telecommunications Corporation

In the Matter of	)	
	)	
Application by Ameritech Michigan	)	CC Docket No. 97-137
Pursuant to Section 271 of the	)	
Telecommunications Act of 1996 to	)	
Provide In-Region, InterLATA	)	
Services in Michigan	)	

AFFIDAVIT OF SAMUEL L. KING
On Behalf of MCI Telecommunications Corporation

I, Samuel L. King, being first duly sworn upon oath do hereby depose and state as

follows:

1.   My name is Samuel L. King. I serve as the Director of Local Project Coordination

for MCImetro, a division of MCI Telecommunications Corporation.

2.   I received a Bachelor of Science degree in Business Administration from the

Pennsylvania State University and joined MCI in June, 1985 in the Information Systems

Development organization as a systems analyst. I proceeded to serve as project lead for

development and implementation of MCI's intelligent network platform supporting such services

as 800, Vnet, Operator Services and 900.

3.   In October of 1992, I joined MCI's Access Services group as Senior Manager of

Systems for Competitive Local Exchange Carriers (CLECs). As Senior Manager, I oversaw the

development of specific system requirements to enable CLECs to interface with MCI as an interexchange carrier (IXC).

4.   In January of 1994, I transferred into MCImetro and established the local systems development group with specialization on the Business Support Systems such as service ordering, billing and customer service.

5.   I now serve as Director of Local Project Coordination with specific responsibility for the development and implementation of local number portability, resale, and incumbent local exchange carrier (ILEC) OSS Interface development. As such, I or members of my department have personal familiarity with the issues discussed herein.

6.   The purpose of my affidavit is to respond to Ameritech's contentions (a) that it provides unbundled access to Operations Support Systems (OSS) functions in conformance with the FCC's Order and (b) that its OSS systems and interfaces are fully ready and complete to satisfy its other obligations under section 271 of the Telecommunications Act. I conclude that Ameritech is not operationally ready from an OSS perspective to provide interconnection, unbundled network elements, or resale in a timely, reliable, and nondiscriminatory manner, and in quantities that may be reasonably requested.

7.   My affidavit is in two parts. Part I presents a general background on OSS functions, their development, and the role they play in the provision of local exchange service as well as the development of local competition. Part II explains why Ameritech's OSS functions are not ready to provide CLECs interconnection and access to unbundled network elements or resale, in a timely, reliable, and nondiscriminatory manner.

8.   In order better to enable the Commission to understand the particular ways in which Ameritech's OSS functions and interfaces are not operationally ready, I will specifically respond, where appropriate, to contentions raised in the Affidavits of Joseph A. Rogers, Robert Meixner, and Rachel Foerster submitted with Ameritech's petition. I will not address Ameritech's claimed "capacity readiness." Capacity readiness issues can be intelligently assessed only in the presence of adequate operational readiness. Because Ameritech's systems are demonstrably not operationally ready, the further question of capacity readiness -- namely, what further increases in volume can the system accommodate? -- cannot be intelligently answered.

I. The role and importance of OSS

9.   In order to appreciate the importance of OSS, it is necessary first to understand what OSS is and does. As one recent industry publication put it, "OSS includes everything that runs or monitors the network, such as trouble reporting or billing systems, but is not actually the network itself."[1] Stated otherwise, OSS consists of all the computerized and automated systems, together with associated business processes, that ensure the carrier can satisfy customer needs and expectations. In today's environment, a carrier simply cannot compete without powerful and efficient operations support capabilities. It is customary and useful to distinguish five discrete business functions OSS serves: pre-ordering, ordering, provisioning, maintenance & repair, and billing, as is explained in the FCC's Local Competition Order.[2]

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[1] Ed Feingold, Making Sense of OSS, Billing World, Jan. 1997, at 21, 22.

[2] See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, at ¶¶ 515, 518, CC Docket No. 96-98, FCC 96-325 (rel. Aug. 8,

10. Like all Bell Operating Companies (BOCs), Ameritech has for years utilized highly complex OSS systems to successfully manage its internal processes and customer interactions. These well-tested systems ensure, for example, that customer service representatives have immediate real-time access to all information necessary to respond fully and correctly to customer queries about such things as the variety and prices of services available, or the status of repair calls. They also ensure, among other things, that customer orders are correctly processed and that bills are accurate and timely.

11. Ameritech's existing systems are complete and adequate to serve its own retail customers. Consistent with the Telecommunications Act of 1996, however, changes must be made to enable competition to develop in the local markets. To the extent new BOC competitors such as MCI must rely on the BOC's network and OSS capabilities for a realistic opportunity to compete, it will be essential for the BOC to develop and implement OSS interfaces and downstream processes sufficient to ensure that they can provide unbundled network elements and resale rapidly and effectively in volumes adequate to satisfy demand. Another related point is that the FCC's rules specifically require that ILECs develop interfaces capable of providing CLECs nondiscriminatory unbundled access to OSS functions. I understand this requirement to mean that ILECs must provide parity to requesting CLECs across three dimensions: scope of information available; accuracy of information supplied; and timeliness of communication.

1996) (hereinafter "Local Competition Order").

Interfaces and Specifications

12.   In order to determine whether a BOC has satisfied the twin requirements that it has implemented OSS systems and interfaces capable of ensuring that it can "fully implement" the competitive checklist, and that it provides nondiscriminatory unbundled access to OSS functions and databases, two questions are key: First, are the interfaces and business processes the BOC employs to communicate with the CLECs adequate to fulfill competitive needs? Second, assuming the BOC proposes to use a competitively acceptable interface to provide competitors access to a particular OSS function, has there been sufficient experience with the interface and associated systems and processes so as to ensure they will work "as advertised"?

13.   In theory there are numerous ways a CLEC might be able to access BOC OSS functions. One basic distinction is between automated access and manual access.

14.   Manual access means that the CLEC's access is mediated by human intervention on the part of the BOC. For example, when a CLEC orders a resale service or unbundled element manually, it ordinarily means that the CLEC transmits an order form to the BOC by facsimile, at which point a BOC employee types the information supplied on the form into the BOC's computerized order entry system. Manual intervention also occurs when, after information is exchanged electronically, a BOC representative must re-enter or otherwise manipulate it before it can be processed downstream.

15.   Manual access arrangements, for products or services that are ordered in quantity, are simply not compatible with MCI's needs as a new entrant. Every manual intervention causes delay, sometimes substantial, and creates significant risk of error. By relying upon manual

interventions, the ILEC makes its competitors dependent on the hours, efficiency, and accuracy of its own employees -- including their incentive or lack of incentive to be efficient and accurate. Also, manual arrangements increase CLECs' costs in two ways: CLECs must employ more people to handle the process and to audit the ILEC's performance; and the ILEC will try to pass its own inflated costs through to the CLECs. Accordingly, solutions that require manual intervention on the ILEC's side cannot be acceptable in either the short or long term. As the Department of Justice has explained, "[R]ecent experience provides strong evidence that attempts at local market entry, even with the benefit of partially automated mechanisms, may founder without automated processes to support rapid and large-scale entry." Evaluation of the U.S. Department of Justice SBC Communications-Oklahoma (DOJ SWBT Brief) at 68. The question, then, is what automated arrangements are satisfactory.

16. Automated access means that information is exchanged between the CLEC and BOC computers. This can be done through a variety of different interfaces and protocols that range widely in degrees of sophistication and utility.

17. The most sophisticated type of automated access is termed electronic bonding and is articulated by several different specific protocols, the most common of which is the Open Systems Interconnect (OSI) Common Management Information Services Element (CMISE) Common Management Information Protocol (CMIP) network management protocol. Electronic bonding solutions are the most sophisticated and useful because, in certain applications, they can allow new entrants to approximate the same real-time access to the BOC's functions as the BOC itself enjoys. From the customer's perspective, interactions with a CLEC that has electronically

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bonded to the ILEC are indistinguishable from interactions with the ILEC. Furthermore, because electronic bonding links the CLEC's existing OSS system to that of the ILEC, the CLEC does not need to develop a new OSS to interface with the ILEC for a given function.

18. Less sophisticated automated access arrangements include dedicated access arrangements. In these arrangements, a CLEC has a computer terminal that gives it direct access to the ILEC's system. The ILEC's system is not connected to the CLEC's system, however. Thus, when the CLEC obtains information from the ILEC system, it must retype that information into its own system.

19. Another less sophisticated automated arrangement involves the transfer of data between computer systems in batches. These "batch transfer" solutions work much like electronic mail. File transfer protocol, perhaps the classic batch interface, transmits large amounts of data at scheduled, periodic intervals. A second common batch transfer interface is Electronic Data Interface ("EDI").

20. Each ILEC should adopt the automated interfaces and data formats adopted and approved by the relevant national standard-setting bodies or industry forums. The four principal groups are: the OBF of the Carrier Liaison Committee; the T1 Committee; the Electronic Communications Implementation Committee ("ECIC"), and the Telecommunications Industry Forum ("TCIF"). All four are sponsored by the Alliance for Telecommunications Industry Solutions ("ATIS") and accredited by ANSI. ILECs should adopt standardized systems for two reasons. First, for CLECs that hope to compete in markets presently controlled by different BOCs, it is absolutely critical that interfaces are uniform. The costs of developing systems and

software and of training necessary to use any particular interface are substantial. This is why most BOCs try to unify their own systems. A nationwide CLEC like MCI must be able to realize similar economies. We can only do so, however, if the several large ILECs conform to nationally standardized interfaces and formats.

21.   Second, the industry forums are well positioned to resolve which interfaces and formats are reasonably necessary and practical for each particular OSS function or sub-function. Different functions and services may create different OSS needs. For example, pre-ordering functions which are conducted while the carrier's service representative is actually speaking with the end-user require real time accessibility; billing functions do not.

22.   For both of these reasons, I agree that "[i]deally, each incumbent LEC would provide access to support systems through a nationally standardized gateway." Local Competition Order ¶ 527.   Consistent with this view, MCI is investing its development funds for OSS in the technical interface solutions developed through the industry forums. The FCC chose to rely on the carriers to agree to nationally standardized interfaces voluntarily. I believe that the likelihood that the large ILECs and CLECs will reach voluntary consensus on nationally uniform interfaces will be sorely tested if the BOCs are allowed to offer in-region long distance services before such solutions are adopted. Because the time and additional capital investment required for CLECs to develop non-standard OSS interfaces are substantial, giving the BOCs incentives toward standardization is critical.

23.   While the industry forums have made substantial progress, they have not yet established standards for all OSS functions.   Although this process can and should be completed

promptly, one still has to ask what a BOC should be expected to do in the interim in order to satisfy section 271. Part of the answer is that the BOC should be expected to adopt the least costly interim solution that would give requesting carriers the same level of access to the BOC's OSS functions as the BOC itself enjoys. Where the basic shape of the industry solution is apparent, for example, the BOC should deploy an interface that fills in the contours of that shape, rather than deploying an unrelated type of interface. That way both the BOC and the CLEC can concentrate their resources on implementing industry standards, while still achieving needed additional functionality through incremental expenditures prior to completion of those standards.

24. In short, a BOC's OSS interfaces should be deemed satisfactory only if these conditions are satisfied: (1) Wherever there exists an existing industry standard, the BOC must have adopted and implemented it; and (2) wherever an industry standard does not yet exist, the BOC must (a) enter into a binding contractual commitment (backed up by adequate contractual guarantees and regulatory penalties) to comply with industry standards as soon as possible (pursuant to a specified implementation schedule) and (b) offer and implement an interim solution that gives requesting carriers the same level of access that the BOC's operational groups have to its systems, and that is as consistent as possible with expected industry standards. As the Department of Justice explained, "adherence to industry standards is more a floor than a ceiling," DOJ SWBT Brief, p. 73 n. 100, a BOC must "begin development of interfaces in anticipation of such standards." DOJ SWBT Brief p. 73.

Operational Readiness

25.   The adoption and implementation of an appropriate OSS interface, configured to appropriate specifications, is a necessary condition for the development of local competition, but it is far from sufficient. The interface merely governs the communication between the BOC and CLECs. The theoretical capacity for rapid and efficient communication between the carriers is of minimal benefit if either the BOC lacks the internal systems necessary satisfactorily to effect the functions a particular interface is designed to support, or the CLECs lack the systems, software, and training needed to make efficient and effective use of the OSS access provided.

26.   In some cases the ILEC can employ the business systems it uses for its own retail customers in order to serve CLECs. But in some cases the new CLEC-ILEC dynamic does impose new requirements on the ILEC's business systems. For example, before the 1996 Act, the ILECs did not have OSS systems in place to effectuate the unbundling of local switching. When a CLEC orders unbundled elements, the ILEC faces a new challenge not only in receiving and understanding that order (this is where the ordering interfaces come in), but also in carrying out that order. Thus, in addition to implementing an adequate interface, the ILEC must put in place business processes to use that interface as it is intended.

27.   Assuming that an ILEC has deployed an appropriate interface and adequate downstream systems, it remains independently critical that the CLEC is able to use the ILEC's interfaces effectively. One may be tempted to assume that is the CLEC's own problem, and that the ILEC has no responsibility to train or support the new entrants. From the perspective of

system development, that is a mistaken view. The ILECs in general, and certainly the BOCs, drive the process. They select the interface, tailor its specifications and vocabulary, and control the timing of its implementation. Moreover, as the staff of the Wisconsin Public Service Commission has explained, because a CLEC will have to rewrite its own OSS interfaces whenever an ILEC modifies its interfaces, "a company with significant market share [like the BOCs] can extend that market share" simply by revising its OSS specifications.[3] This is true even where a BOC nominally adopts an interface approved by an industry forum, because most industry-standard interfaces are loosely defined to allow individual carriers flexibility in tailoring their own specifications. Consequently, just as the market requires the manufacturer of a complicated software package to provide initial and ongoing customer support, regulators must ensure that the BOCs provide CLECs with adequate training and assistance -- including complete and intelligible manuals and pull-down on-screen menus where necessary.

28.   In order for an OSS interface to work as planned, the interface itself, the business processes, and the training must all function appropriately. Ensuring that this occurs is a lengthy process and requires careful planning and testing. After each carrier's systems are developed and deployed, it is necessary to conduct "integration" testing -- full end-to-end trials designed to make sure that the systems can communicate properly with each other to accomplish the intended results in the designed manner. After integration testing has been successfully completed, it is time to put the systems into actual competitive use, supporting "live" customer transactions.

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[3] Memorandum Re: Matters Relating to Satisfaction of Conditions for Offering InterLATA Service, Docket No. 6720-TI-120, at 11 (Wisc. PSC, Feb. 6, 1997).

Even once this stage of actual implementation is reached, however, testing is not completed. To the contrary, it is almost inevitable that the early stages of actual competitive use will reveal design and operating flaws that had escaped detection up through integration testing, thus requiring further trouble-shooting and system modification.

29.   Experience proves the critical point that a successfully tested OSS system is not the same thing as an operationally and commercially satisfactory system. The access arena shows why. For example, Bell Atlantic has been re-engineering many of its OSS systems since 1995. In November 1996, it implemented the second phase of the new release of its Subscription System, which processes PIC changes, allowing customers to change carriers. Bell Atlantic assured MCI and other IXCs that its new version had satisfied thorough internal testing before being introduced for commercial use. Nonetheless, the new system has been disastrous in actual operation. For example, it has failed to process numerous properly inputted PIC change orders, has delayed the processing of many others for a week or longer, and has returned incorrect responses to MCI orders that, among other things, incorrectly report existing subscriber accounts as nonexistent or closed. Furthermore, Bell Atlantic's OSS lacked controls to identify the processing problem quickly. As a result, weeks passed before MCI was even notified that Bell Atlantic was not properly effectuating customer PIC changes. Needless to say, these system failures have caused substantial customer confusion and dissatisfaction. They have also imposed losses on MCI that could amount to a million dollars in lost revenue. Bell Atlantic has acknowledged that these problems are directly due to errors in its OSS systems. However, these errors have not all been corrected even today.

30.   As the foregoing discussion should make clear, from an OSS perspective, paper

promises are not enough to ensure effective real-world application. Because deploying

"operationally ready" OSS is a substantial and time-consuming undertaking, there is a real

difference between saying a system is ready and actually using it to provide services in a

commercially satisfactory way. As the Department of Justice has explained, "industry experience

demonstrates that, even after significant testing between BOCs and CLECs, wholesale support

processes, both automated and human, rarely function as advertised . . . ." DOJ SWBT Brief p.

81. In light of the innumerable potential glitches and pitfalls that must be eliminated prior to

commercial availability, one cannot know how well things can be provided until they are

supported by a full and varied track record of having been provided. In short, OSS must be in

real competitive use (not just business trials), subject to auditing and monitoring of key

performance indicators and/or operation performance indicators before OSS can be deemed to be

operationally and competitively satisfactory.

II.   The Inadequacy of Ameritech's OSS

Summary of Problems

31.   Given this background, for reasons I will explain in detail, I believe Ameritech's

application is patently inadequate from an OSS perspective. Although Ameritech has made some

progress, it remains far from either offering non-discriminatory unbundled access to OSS functions

or ensuring that other checklist items can be provided in timely, reliable, nondiscriminatory

fashion, and in volumes adequate to meet demand. In my view, Ameritech's application falls short

both because it employs inappropriate interfaces and because it does not demonstrate that the interfaces and supporting systems are operationally ready.

32.   First, some of Ameritech's interfaces are simply the wrong interfaces to employ. Ameritech's ASR interface for ordering unbundled loops, for example, is not the industry standard, requires too much manual intervention, and creates a fragmented ordering process that substantially impedes CLECs ability to compete. Other inadequate interfaces offered by Ameritech include its manual, or perhaps non-existent, processes for jeopardy notification and completion notification with respect to unbundled elements. Ameritech's non-standard USOC codes and non-standard interfaces for billing and perhaps for pre-ordering are also inadequate. Ameritech's assertions that these interfaces reflect industry standards, Rogers Aff. ¶ 8, ignores the fact that they are not industry standard for the purposes for which Ameritech employs them.

33.   Second, Ameritech's OSS is not operationally ready. Even for the processes with which Ameritech has had the most experience, those for the ordering of resold POTS (Plain Old Telephone Service), significant problems remain. These include the disappearance of more than 21% of MCI's EDI orders into the "black hole" of Ameritech's systems, dropped or erroneously added features on 27% of MCI's EDI test orders, manual intervention on 26.7% of the orders completed (based on Ameritech's data from the best month it reports); double billing of more than 12% of MCI's customers,[4] and others. Although I do not expect Ameritech's systems to be perfect, the sheer quantity of remaining errors while the systems are still functioning at relatively

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[4]Ameritech purports to have fixed this problem, but there is no data to show the fix has worked, and there is much reason to be skeptical.

low volumes, as well as the type of errors, show that even Ameritech's ordering interface for resale POTS is not yet operational.

34.   These problems are likely to pale in comparison to those likely to exist as Ameritech begins implementing its other interfaces. As Ameritech and CLECs have gained experience with use of Ameritech's processes for ordering resale POTS, Ameritech has at least made progress in reducing some of the problems it has had. But Ameritech is only at the beginning of this process with respect to its other interfaces. In particular, it has very little, if any, experience with the use of its EDI interface for ordering any complex services, such as Centrex or ISDN, for resale, or any unbundled elements or combinations of unbundled elements. These are vital to MCI's ability to compete, and the Ameritech provisioning process for these services is significantly more complicated than for the ordering of resale POTS. Ameritech also lacks experience with its pre-ordering interface, its maintenance and repair interface, and its billing of CLECs for unbundled elements.

35.   Below I will detail the specific difficulties with Ameritech's processes for each of the OSS functions. I will begin, however, by giving a brief overview of MCI's interactions with Ameritech on OSS to explain why we are at the point we are today. I will then give an overall critique of the studies on which Ameritech relies to prove operational readiness. Finally, I will turn to a function by function analysis of Ameritech's OSS.

A Brief History of MCI's Attempt to Work with Ameritech to Implement Adequate OSS

36.   Although Ameritech makes it appear that it is trying hard to deploy adequate OSS, and in some respects it has made efforts to do so, Ameritech has substantially contributed to the delays in the ability of MCI to develop its end of the OSS interfaces, and to test and begin using those interfaces.

37.   Until April of this year, four months after this Commission's January 1 deadline for provision of specifications, Ameritech's written materials were wholly inadequate as a basis for MCI to understand how to order Ameritech products. Prior to April, the guides largely consisted of very high level product descriptions or very low level descriptions of specific EDI fields. The guides contained no adequate description of products with an accompanying description of how to order them. If the guides had been a cookbook, they would have contained a picture of a cake and a list of ingredients; they would not have provided a recipe describing how to convert the ingredients into a cake. For example, the guides only contained a seven page description of Centrex which basically said what Centrex was, not how to order Centrex. In contrast, Ameritech's April guides, like the recently approved OBF ordering specification for Centrex, are over 100 pages long.

38.   Only in April did Ameritech finally present documentation helpful to CLECs in converting the "ingredients" into a "cake." And it provided this documentation to MCI's attorneys as part of the Illinois § 271 case, not to the business people who actually needed the manuals. For reasons I will discuss below, even these manuals are not fully adequate. Moreover, the April

guides only describe how to order products manually -- the materials necessary to translate these manual orders to EDI were not provided until the end of April, and then only for resale based POTS services. Ameritech has not yet provided a similar "translation" guide for other types of orders.

39.   In the absence of adequate written materials, MCI first requested a meeting to discuss EDI with Ameritech on October 7, 1996. Ameritech agreed to meet on October 30, ex. 1, but then canceled the meeting on October 29. The first conference call on EDI was finally held on November 22. (E-mail from Dora Ross, ex. 2).

40.   Similarly, in November 1996, MCI requested a meeting on trunks and posed specific questions on trunks. (E-mail from Lavinna Lissenburg, p. 2, ex. 3) It took Ameritech two months to get back to us. (E-mail from Judy Cleland, p. 1 ex. 4). Even then, setting up meetings proved extremely difficult, because Ameritech only had one person assigned to MCI's account. We finally had a meeting on April 16 to answer the questions MCI had raised months before.

41.   Along with delaying the ability of MCI to obtain needed information, Ameritech often provided answers that were inaccurate or not fully accurate. These inaccurate answers likely resulted from Ameritech not being organized, but these answers nonetheless delayed MCI's ordering development. For example, in the beginning of February, Ameritech gave MCI an incorrect code for ordering toll restrictions. When MCI began sending orders using this code and these orders were rejected, Ameritech gave MCI a different, but still incorrect code before finally providing MCI the correct code at the end of April. Similarly, in the same time period, Ameritech gave MCI incomplete information on how to order 900-976 blocking which it failed to correct until the end of May. Ameritech also failed to explain that orders for "Caller ID with name" must

also include an order for caller ID or they would "error out." Although each of these examples is not of overwhelming importance, the cumulative effect of these and similar problems is significant. MCI must spend time to obtain the proper information; then, each time that MCI is given new information, it must reprogram its systems. Sometimes this only requires a relatively simple table update, but sometimes it requires a more complicated addition of fields.

42.   Despite the obstacles placed in its path, MCI has been testing Ameritech's ordering processes since November of last year by placing manual orders. Because it has lacked adequate information, MCI has had to "program by rejects" -- learning the proper format for orders based on the orders that have been rejected. As it has succeeded in this learning process and as it obtained adequate information, MCI also began testing Ameritech's EDI interface for resale POTS in February and went into production on April 21 using EDI in Illinois.

43.   The hurdles that Ameritech has placed in MCI's path have been even more significant on the unbundled elements side. MCI has been trying to place orders for unbundled elements for six months. However, in addition to the deficiencies in Ameritech's documentation discussed above, the pre-April guides contained very little information on ordering unbundled elements. Even in Ameritech's April guides, only fifteen pages out of four volumes discuss how to order combinations of elements. Basically, the guides instructed that CLECs need to contact Ameritech to determine how to order the four combinations that Ameritech has defined as "standard." As to other combinations, the guides simply referred to Ameritech's bonafide request (BFR) process. For example, ordering the platform with routing to our OS/DA platform requires a BFR, and no further information is provided about this offering..

44.   Until recently, MCI was faced with a far bigger barrier to ordering unbundled elements. Although MCI requested to begin testing the ordering of unbundled elements in January, (Letter from Therese Fauerbach, ex. 5), Ameritech simply refused to allow testing of unbundled elements until MCI had a signed interconnection agreement -- making it impossible to move forward on developing and testing OSS for unbundled elements. (Letter from Ray Thomas, ex. 6). Only at the end of March, after MCI and Ameritech signed an interconnection agreement in Ohio, did Ameritech agree to allow testing. At that point, MCI moved quickly, placing two recombination orders manually on April 22 and meeting to discuss a 30 day trial of two unbundled element combinations on May 20, and submitting a bonafide request for complex unbundled element combinations on May 23. (Letter from Michael Hussey, ex. 7). Hence, within a short time of being allowed to do so and without yet having received adequate documentation, MCI moved to test Ameritech's OSS for combinations of unbundled elements.

45.   We are today in the process of working with Ameritech to develop an OSS for ordering unbundled network elements. Ameritech's assertions to the contrary notwithstanding, no such OSS is available today. It should be noted that the exchange of documentation and the meetings of carriers constitute the very beginning of the process of implementation of OSS. And whatever delay there has been in beginning this process has been entirely Ameritech's.

46.   MCI is also discussing implementation of EDI version 7.0 with Ameritech. Until Ameritech implements that version, or at least some way for MCI to order unbundled loops with interim local number portability in a single order, it is hardly worthwhile for MCI to begin ordering unbundled loops as a way of providing service to its customers. Ameritech's ASR process is far too cumbersome, as well as being proprietary.

47.   MCI has moved as quickly as it can. MCI has pressed for meetings, documents, and testing. In general, it is Ameritech that has delayed the process. Regardless of whether this was out of bad faith or simply because it was not yet ready, it is disingenuous for Ameritech to now say that its systems are ready and CLECs are failing to use them.

Overview of Internal Tests and Andersen Consulting Study

48.   Ameritech lacks commercial experience with most of its OSS. The Illinois staff recently pointed out that in the matrix of Ameritech's own affiant, Mr. Meixner, of 105 possible boxes for OSS, only 11 show actual commercial use. Supplemental Initial Brief of the Staff of the Illinois Commerce Commission ("Illinois Staff Brief"), at 15-16 (May 21, 1997) (ex. 8). Yet, as I explained above, only through commercial deployment is a LEC able to iron out problems with an interface and demonstrate that it can be used successfully.

49.   Nonetheless, largely relying on internal testing which it says should prevent any significant errors once OSS is commercially deployed, Meixner Aff. at ¶ 16, Ameritech has been touting the readiness of all of its interfaces since at least December of 1996. It has touted the readiness of its ordering interfaces since February of 1996. Rogers Aff. ¶ 31. It has touted that readiness in its premature filing before this Commission, and in filings in Illinois and Wisconsin.

50.   There is particular reason to be skeptical of Ameritech's use of test results to prove operational readiness. Where there now has been some commercial experience with Ameritech's systems -- for the ordering of resale POTs, Ameritech's claims of operational readiness have proven grossly exaggerated. Indeed, Ameritech's own data shows that in January of 1997, 11

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months after Ameritech's ordering processes and interface were ostensibly ready, Ameritech rejected 34.4% of the orders placed and processed 47.7% of orders manually. Meixner Aff. Schedule 4. MCI's own early experiences confirmed the existence of major problems.

51.   As a result, Ameritech's claims of readiness have been found deficient by an ALJ in Illinois, by the Wisconsin Commission, and, again recently, by the Illinois staff. As the Department of Justice explained, "the record in the Wisconsin proceeding revealed significant problems with Ameritech's EDI resale ordering interface -- an interface Ameritech had claimed was tested and commercially operated withe U.S. Networks since February 1996, over a year prior to the Wisconsin Commission's decision." DOJ SWBT Brief p. 86.   Or as Wisconsin Commissioner Parrino put it, "there are still major problems and major problems that are Ameritech's." Transcript of Private Court Reporter, p. 10 (ex. 9).

52.   Ameritech's claims about its OSS now follow a predictable pattern. Every time Ameritech's claims of readiness are challenged in a real-life setting, those claims prove false. And every time its claims prove false, Ameritech protests that it has subsequently fixed the problem. And then these new claims that finally, unlike the last time, the OSS really does work, themselves prove false.

53.   Once again, in this proceeding Ameritech touts the readiness of its systems. It explains that many of the problems that have been revealed with its ordering interface are not of a type "that would materially impact a CLEC's business operations," and they have in any case largely been resolved. Rogers Aff. ¶ 38, 105. However, lengthy service delays, large rejection rates, double billing, and feature fall off, problems detailed in the state proceedings, are service affecting by any measure.   As I will point out below, while Ameritech has made some progress in

correcting some of these problems, these and other problems remain serious. In addition, attempts

to fix these problems have taken a long time. For example, it took Ameritech three months to

identify the source of its double billing problem and to implement an inadequate manual fix.

54. Equally important, however, in light of MCI's initial error-plagued experience with

Ameritech service resale, and the delays in beginning to "fix" these problems, Ameritech's

reliance on its implementation tests to demonstrate that its OSS interfaces and backend systems

operate properly for functions for which Ameritech has no commercial experience, and that all

errors can be quickly resolved without affecting service are not creditable. As a result, the fact that

Ameritech has made some progress toward adequate ordering procedures for resale POTS hardly

demonstrates, for example, that Ameritech's ordering interface is ready with respect to unbundled

elements, combinations of elements, or even complex services for resale.

55. Ameritech's witnesses Mr. Rogers and Mr. Meixner do not seem to have learned

the lessons of their prior testimony. Mr. Rogers, one of Ameritech's current affiants, has

submitted affidavits or testified in the earlier Michigan proceeding, in Wisconsin, and in Illinois.

Mr. Meixner of Andersen Consulting, another present Ameritech affiant, also testified in Illinois in

April.

56. Each time that Mr. Rogers has relied on internal testing to demonstrate operational

readiness, CLEC experience has shown the systems are not ready. In fact, in March,, after CLEC

testimony revealed several major problems of which he claimed to be unaware, Mr. Rogers was

forced to admit that there were some errors that had to be fixed before he could state with

confidence that the systems were operational. 3/31/97 Tr., PSC of Wisc., Docket No. 6720-TI-

120, pp. 183-84 (ex. 10). As a result, Wisconsin Commissioner Parrino stated that if Ameritech

was again going to rely on internal test data to prove operational readiness, it should be a rigorous

test in which other industry participants have input, because "I'm not comfortable, given the

information that surfaced with the problems with 865 and 850, that Mr. Rogers is going to get the

right answer when he goes to his people because it seems like they are going to tell him that

everything is working okay. . . ." Transcript of Private Reporter, p. 19 (ex. 9). Notwithstanding,

Mr. Rogers again touts the readiness of Ameritech's systems, largely based on the same internal

testing that has been proven deficient time and again in the past.

57.   Mr. Meixner's "independent" review of Ameritech's systems do not change this

picture. As the Illinois Staff recently concluded, Mr. Meixner's review also relied primarily on

internal testing. Ameritech did not provide Mr. Meixner access to its logs documenting problems

with its interfaces, Illinois Phase II Tr. 1776-81 (ex. 11), and Mr. Meixner did not contact any

CLECs to determine what their real world experience with the systems had been. Phase II Tr.

1782, 1784 (ex. 11). Mr. Meixner did not even attempt to determine whether Ameritech was

meeting its delivery due dates. Phase II Tr. at 1814 (ex. 11). In addition, Mr. Meixner's opinion

about operational readiness is narrowly limited to the OSS interfaces and does not include an

evaluation of Ameritech's back-end systems, Phase II Tr. at 1801, 1805 (ex. 11) -- the very systems

where some of the biggest implementation problems, such as the double billing problem I discuss

below, have arisen. Finally, Mr. Meixner's opinion should be rejected, because it was

predetermined. Andersen Consulting's engagement letter with Ameritech required it to provide an

affidavit or written testimony to support Ameritech's § 271 application.. Phase II Tr. 1832-34 (ex.

11). As a result, the Illinois staff recently noted that "the independence of the review is suspect,

since the scope and performance of the audit team's work was heavily influenced by the auditee"

and recommended denying Ameritech's § 271 application despite Mr. Meixner's testimony.

Illinois Staff Brief at 17 (ex. 8). Mr. Meixner has done nothing to eliminate these difficulties in his

present affidavit.

58.   As a result, as I will explain in detail below, Ameritech's systems are simply not

ready, and nothing in the testimony of Ameritech's discredited witnesses should give regulators

comfort that Ameritech has resolved the many problems identified by state regulators. Indeed, this

conclusion seems required by Mr. Rogers' own acknowledgment earlier this year that OSS

systems cannot be deemed operationally ready prior to full integration testing.[5] Similarly, it is

required by Ameritech's letter to this Commission, explaining the need for extensive testing of

OSS with customers prior to Ameritech's entry into long distance (ex. 12, p.2).

59.   Ameritech's claims about its OSS now follow a predictable pattern. Every time

Ameritech's claims of readiness are challenged in a real-life setting, those claims prove false. And

every time its claims prove false, Ameritech protests that it has subsequently fixed the problem.

And then these new claims that finally, unlike the last time, the OSS really does work, themselves

prove false.

60.   If Ameritech is allowed to enter long distance now, it will lose its incentive to

continue to work towards readiness of its systems. In Ameritech's case, the connection between §

271 and movement towards readiness is particularly clear. It was only during state § 271

proceedings that Ameritech delivered its improved ordering guides and only during those

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[5] See Oral Testimony of Joseph A. Rogers, before Ill. Comm. Comm'n, Docket No. 96-0404
(Jan. 16, 1997), hearing transcript at 1101, 1108-09.